NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP

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August 1, 2005

First Class Mail

Mr. Brad Bradley U.S. Environmental Protection Agency 77 West Jackson Boulevard Chicago, IL 60604-3590

> RE: NL Industries/Taracorp Superfund Site; Granite City, Illinois Consent Decree Progress Report 75 (July 2005)

Dear Mr. Bradley:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the "site"), two copies of this letter are submitted on behalf of the NL Industries/Taracorp Superfund Site Group ("Group") to provide the U.S. Environmental Protection Agency ("EPA") with a progress report for operation and maintenance activities that were performed during June 2005.

1. Actions Taken During Previous Month to Comply with the Consent Decree:

- On July 1, 2005, the Group's project coordinator issued a monthly progress report to EPA.
- On July 1, 2005, the Group's project coordinator issued letters to Mr. Dick Cieslak (Bissell Street Warehouse Co. property), Mr. Willie Foster, Ms. W. Rose Foster, Mr. Larry Hurt (Terminal Railroad Association of St. Louis), Mr. John Orlashik (National Steel Corporation), Mr. George Webb (Metalico), and Mr. Mark Bayley (Martin and Bayley, Inc.) to advise them that the Group's groundwater consultant, ARCADIS G&M, Inc. ("ARCADIS"), planned to remove and properly close the monitoring well(s) located on their properties during the period from July 12 13, 2005.

- During the week of July 3, 2005, the Group's contractor, Granite Glass and Fence, repaired about 20 - 25 feet of security fence along State Street at the site.
- During the week of July 10, 2005, ARCADIS mobilized to the site and abandoned groundwater monitoring wells in accordance with EPA's prior authorization.
- On or about July 11, 2005, ARCADIS field personnel were advised during well abandonment work at the site that Cara Metals IL LLC ("Cara Metals") had acquired the former National Steel Corporation property in Granite City. ARCADIS obtained oral authorization from a representative of Cara Metals to abandon the monitoring wells.
- On July 12, 2005, the Group's project coordinator spoke to Mr. Tobie Cauffiel, Cara Metals, in regard to the monitoring well abandonment work. In response to Mr. Cauffiel's request, the Group's project coordinator provided a letter to Mr. Cauffiel on July 14, 2005 that included copies of laboratory data sheets from the testing of groundwater samples collected by ARCADIS in December 2001, July 2002, and March 2003 from monitoring wells 115S, 115D, 124S, 124D, and 125 located on the former National Steel Corporation property.
- On July 15, 2005, the Group's project coordinator provided a memorandum to EPA's project manager that included a photograph showing the repairs recently made to the fence along State Street at the site.
- During July 2005, the Madison County Community Development Agency ("MCCDA") continued to seek additional applicants for participation in the supplemental environmental project ("SEP") and continued to prepare for work activities for applicants who have previously been accepted into the program.

2. Summary of Data and/or Results of Sampling and Tests Received:

Not applicable for this reporting period.

3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Month:

• Not applicable for this reporting period.

4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:

- At the present time, the Group anticipates that ARCADIS' asphalt contractor will repair some asphalt on Metalico's property in August 2005 that was damaged during well abandonment activities. In addition, the Group also anticipates that ARCADIS will prepare a report to document well abandonment activities performed at the site during the week of July 10, 2005. The report will be issued to EPA upon completion.
- The Group will continue to perform operation and maintenance activities at the site, as necessary.
- The MCCDA will continue to implement the SEP. The Group anticipates that a progress report will be received from the MCCDA in August 2005 which will be provided to EPA upon receipt.
- Upon receipt of Taracorp's comments on the draft Declaration of Restrictive Covenants, the Group will advise EPA, provide Taracorp's comments to EPA, and will proceed with efforts to impose the deed restrictions on the Taracorp pile properties at the site.

5. <u>Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:</u>

 As previously reported, the level of public participation in the SEP kick-off event on April 13, 2005 was less than anticipated by the MCCDA. The MCCDA will continue efforts to attempt to obtain additional participation.

6. Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:

Not applicable for this reporting period.

7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:

 As noted above, the MCCDA will continue efforts to attempt to obtain additional participation in the SEP. Mr. Brad Bradley August 1, 2005 Page 4

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.

Jeffrey A. Need Project Coordinator

cc: Mr. Doyle Wilson - Illinois EPA (by first class mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group
(by first class mail)